

REMARKS

This is intended as a full and complete response to the Office Action dated November 21, 2006, having a shortened statutory period for response set to expire on February 21, 2007. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, the paragraph [0035] has been amended to correct minor editorial problems.

Claims 1-23 are pending in the application. Claim 1-23 remain pending following entry of this response. Claims 1, 2, 4, 5, 6, 9, 10, 14, 15, and 20 have been amended. Applicants submit that the amendments do not introduce new matter.

Claim Rejections - 35 U.S.C. § 102

Claims 1-23 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Kuchinsky et al.* (US2005/0039123)(hereinafter "*Kuchinsky*").

Applicants respectfully traverse this rejection.

Claims 1-23 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Rosenzweig et al.* (7,020,848)(hereinafter "*Rosenzweig*").

Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, neither *Rosenzweig* nor *Kuchinsky* disclose "each and every element as set forth in the claim". For example, they do not disclose "generating one or more indicia maps indicating objects in the view having corresponding annotations." Further, both *Rosenzweig* and *Kuchinsky* fail to disclose "providing an indication of

objects in the view having corresponding annotations, based on the one or more indicia maps.” The Examiner argues that *Kuchinsky* discloses these elements at figures 4A, 7A, paragraphs 0072, 0088, 0134, and that *Rosenzweig* discloses these elements at Col. 3, lines 16-23, lines 55-64, Figures 1 and 2. However, the cited passages are in fact directed to the use of annotations generally.

Although claim amendments are presented herein, the amendments are made only for clarification, and thus, the original meaning and scope of the claims are preserved. Therefore, Applicants submit that the references do not disclose the amended elements or the corresponding unamended elements of the previous claims. Accordingly, Applicants believe they are entitled to a full range of equivalents for purposes of any claim construction under the doctrine of equivalents.

Kuchinsky deals with graphical representations of biological diagrams. (See *Kuchinsky*, Abstract) Applicants respectfully submit that the passages Examiner has referenced teach only the general use of annotations in the setting of navigating through various biological diagrams. For example in paragraph 0072 of *Kuchinsky* the word “annotations” is used only as part of list of different types of biological data that could be co-related.

Rosenzweig is a Graphical user interface for managing digital pictures. (See *Rosenzweig*, Abstract). Again, the cited passages merely recite the use of annotations generally; here in the context of user created annotations for digital pictures. (See Figures 1 and 2, marker 122.)

While both *Kuchinsky* and *Rosenzweig* use annotations, neither is directed to the management of annotations. Therefore, neither has any reason to generate indicia maps indicating objects having corresponding annotations, much less to then provide an indication of objects having corresponding annotations based upon those indicia maps.

Therefore, the claims are believed to be allowable, and allowance of the claims is respectfully requested.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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